



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

August 28, 2013

Leslie Grey  
Environmental Protection Specialist, AAL-614  
Federal Aviation Administration, Alaska Region, Airports  
222 W. 7<sup>th</sup> Avenue, #14  
Anchorage, Alaska 99513-7587

Re: EPA comments on the Final Environmental Impact Statement for Improvements to the Runway Safety Area at the Kodiak Airport, EPA Project #07-007-FAA.

Dear Ms. Grey:

We have reviewed the Final Environmental Impact Statement for the Improvements to the Runway Safety Area at the Kodiak Airport project in Kodiak, Alaska (CEQ #20130229) in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

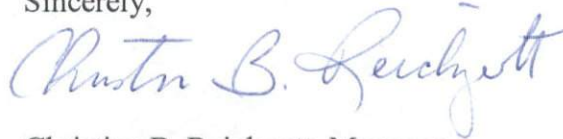
In our December 18, 2012, letter on the Draft EIS we identified a rating of EC-2 and stated our primary concerns regarding mitigation for potential cumulative impacts to resources in the project area, as well as the direct loss of intertidal and subtidal marine habitat, loss of marine life, decreased water quality and reduced habitat connectivity. We also expressed concern regarding the lack of information quantifying the incremental reduction in the extent of personal injury and aircraft damage anticipated with each alternative.

We recognize and commend the efforts of the FAA and partner agencies to develop a mitigation plan that will offset and compensate for the unavoidable impacts to waters of the U.S. and other resources that have the potential to be affected by this project. We continue to recommend that mitigation plans contain an explanation of how proposed actions will offset specific impacts identified in the EIS. In addition, it is important for the mitigation plan to articulate the methods used to calculate project debits and/or compensation ratios. The disclosure of this information lies firmly within NEPA practice. For this specific project, it is also important that the U.S. Army Corps of Engineers be able to readily demonstrate that the proposed compensatory mitigation complies with the standards found in 33 CFR Part 332/40 CFR Part 230 *Compensatory Mitigation for Losses of Aquatic Resources*.

We also remain concerned that the EIS does not include estimates regarding the incremental improvements in safety provided by each alternative. We continue to believe that this is an important piece of information to justify the environmental impacts as well as high costs of these types of projects. We will continue to recommend that this information be included for similar projects in future analyses.

We appreciate the opportunity to review the Final EIS and for including our staff in the ongoing mitigation discussions. Please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) , with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit